

United States District Court

FILED

NORTHERN

DISTRICT OF

CALIFORNIA

UNITED STATES OF AMERICA

V.

GHIA ROLDAN ANGELES

Venue: SAN FRANCISCO

RICHARD W. MEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CRIMINAL COMPLAINT

EDL

(Name and Address of Defendant)

CASE NUMBER: 3:07 70270

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about May 8, 2007 in San Francisco County, in the Northern District of California defendant did, utter, use, attempt to use, possess, obtain, accept or receive a visa, permit, border crossing card, or alien registration receipt card, or other document prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States, knowing it to be forged, counterfeited, altered, or falsely made, or to have been procured by means of any false claim or statement, or to have been otherwise procured by fraud or unlawfully obtained, in violation of Title 18 United States Code, Section 1546.

I further state that I am a Customs and Border Protection Officer and that this complaint is based on the following facts:

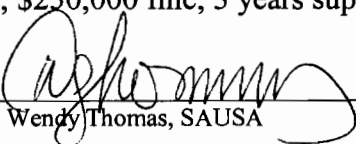
See attached Affidavit in Support of Criminal Complaint

Maximum Penalties:

Title 18 USC Section 1546:

10 years of imprisonment; \$250,000 fine; 3 years supervised release; and \$100 special assessment fee

APPROVED AS TO FORM:

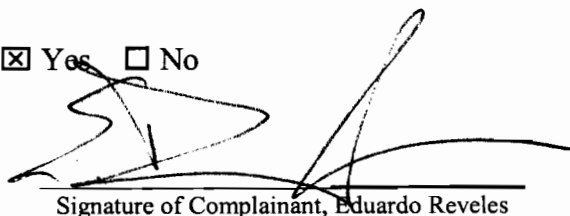

Wendy Thomas, SAUSA

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Warrant of Arrest Requested:

☒ Yes ☐ No

Bail Amount: N/A


Signature of Complainant, Eduardo Reveles

Sworn to before me and subscribed in my presence,

May 10, 2007

at

San Francisco, California

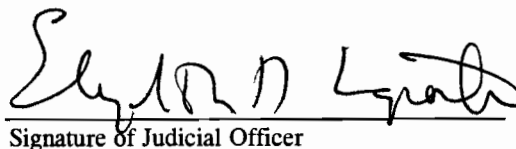
Date

City and State

Elizabeth D. Laporte

United States Magistrate Judge

Name & Title of Judicial Officer


Signature of Judicial Officer

UNITED STATES DISTRICT COURT)
) ss. AFFIDAVIT
NORTHERN DISTRICT OF CALIFORNIA)

**AFFIDAVIT IN SUPPORT OF A CRIMINAL
COMPLAINT CHARGING
GHIA ROLDAN ANGELES
WITH VIOLATING 18 U.S.C. § 1546,
FRAUD AND MISUSE OF VISAS, PERMITS, AND OTHER DOCUMENTS**

I, Eduardo Reveles, do swear and affirm as follows,

Purpose

1. This affidavit establishes probable cause to arrest Ghia Roldan ANGELES for violating 18 U.S.C. § 1546, Fraud and Misuse of Visas, Permits, and Other Documents, when she presented a United States visa to Customs and Border Protection officers at the San Francisco International Airport knowing it to be a counterfeit document. This affidavit is based in part on personal knowledge, interviews, and reviews of official documents and records, and does not contain every fact, piece of information or evidence concerning this alleged violation.

Affiant Background

2. I am an Officer with the United States Department of Homeland Security, Customs and Border Protection ("CBP"). I have been employed with CBP since March of 2003. Previously, I was employed as an Immigration Inspector with the United States Department of Justice, Immigration and Naturalization Service, beginning on June 15, 2002. My duties include the investigation and prosecution of violations of the Immigration and Nationality Act and related criminal immigration statutes.

Relevant Statute

3. Title 18 U.S.C. § 1546(a), Fraud and Misuse of Visas, Permits, and Other Documents, states, in relevant part: “Whoever knowingly utters, uses, attempts to use, possesses, obtains, accepts, or receives any visa, permit, border crossing card, alien registration receipt card, or other document prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States, knowing it to be forged, counterfeited, altered, or falsely made, or to have been procured by means of any false claim or statement, or to have been otherwise procured by fraud or unlawfully obtained”— is guilty of a felony.

Case Facts and Evidence

4. On May 8, 2007, the subject arrived at the San Francisco International Airport onboard Singapore Airlines Flight Number 002 from Singapore at approximately 7:30 p.m. The subject presented an Philippine passport that was not expired (Number UU0825229) and an expired Philippine passport (Number GG884825). The expired Philippine passport presented by the subject included a United States tourist/business Visa (Number 37408578). The subject presented these documents to the primary officer for admission into the United States. The subject also presented an Arrival/Departure Form I-94 (Number 222176278) to CBP Officer Troy Medeiros along with a Customs Declaration Form 6059B. All the documents presented were in the subject's name, Ghia Roldan ANGELES.

5. At that time, Officer Medeiros noticed inconsistencies with the Visa presented for inspection. Specifically, Officer Medeiros noticed the placement of the subject's nationality on the Visa was improperly indented. Officer Medeiros referred the subject for further examination to passport control secondary to verify the authenticity of the Visa.

6. The Visa was then examined by the San Francisco International Airport forensic lab. Visual inspection of the Visa in the forensic lab under VCS-4 wavelength lighting isolated where the original writing on the visa had been and revealed that the Visa had been chemically washed. CBP Officer Hernani Del Rosario queried the Consular Consolidated Database ("CCD") which revealed the Visa's foil number (Number 37408578) was originally issued to a Herminio Jr. Lopez Balagat on a Philippine passport (Number GG417723) on April 2, 2001. Based on this inspection it was determined that the Visa was altered and had a photo substitution.

7. On May 8, 2007, the subject was placed under oath, sworn, and administratively interviewed by CBP Officer Benito Pangan in English (Sworn statement form I-867A & B). The subject admitted that her true name is Ghia Roldan ANGELES. The subject stated she was born in the Philippines and is a citizen of the Philippines. The subject stated her date of birth is October 3, 1978. The subject stated she never applied for a visa at the United States embassy in Manila, Philippines.

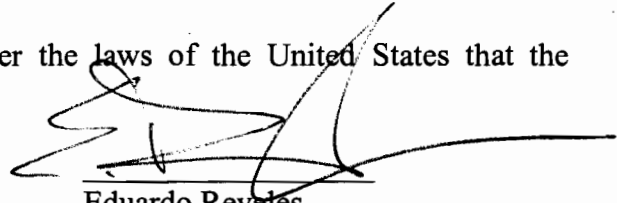
8. The subject stated she provided one passport and two photographs to a messenger, working on behalf of a Mr. Efren, in Quezon City, Philippines. The subject stated she met Mr. Efren through her aunt, who provided Mr. Efren with the subject's telephone number to make arrangements in the Philippines to secure a visa and passport for travel to the United States. The subject stated that her sister deposited three thousand dollars (\$3,000) into Mr. Efren's bank account in the United States. The subject also stated that Mr. Efren would later be paid a remaining balance of nine thousand dollars (\$9,000) for a total of twelve thousand dollars (\$12,000).

9. The subject admitted to presenting the counterfeit Visa in her application for admission to the United States with the hopes of gaining entry to obtain unauthorized employment.

Conclusion

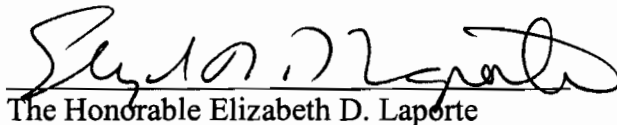
10. I respectfully submit that the above presented facts establish probable cause to believe that Ghia Roldan ANGELES did possess and utter a visa knowing it to be counterfeit when she presented a United States tourist/business Visa to Customs and Border Protection officers at the San Francisco International Airport in violation of Title 18, United States Code, Section 1546, Fraud and Misuse of Visas, Permits, and Other Documents, while in the Northern District of California.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.



Eduardo Reveles
U.S. Customs and Border Protection
U.S. Dept. of Homeland Security

SUBSCRIBED AND SWORN BEFORE ME
ON May 10, 2007



The Honorable Elizabeth D. Laporte
US Magistrate Judge
Northern District of California